

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

MARCELA SANTANA,  
Plaintiff

VS.

FIRST AMERICAN SOLUTIONS,  
LLC, CK ASSET HOLDINGS, LLC,  
MARK STEVENS AND KENNETH  
JONES  
Defendants

CIVIL ACTION NO. 3:11-cv-186

## **PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff hereby moves for default judgment against Defendants, First American Solutions, LLC, CK Assets Holdings, LLC, Mark Stevens and Kenneth Jones. Defendants were served via personal service on May 20, 2011. *See* Group Exhibit A. Defendants have offered no explanation for their failure to answer the instant Complaint. Accordingly, Plaintiff seeks default against Defendants in the amount of four thousand four hundred forty three dollars and eighty five cents (\$4,443.85), representing statutory damages in the amount of one thousand dollars (\$1,000.00), 15 U.S.C. §1692(k)(a)(2)(A), two thousand six hundred ninety nine dollars (\$2,699.00) in attorney fees and seven hundred forty four dollars and eighty five cents (\$744.85) for court costs.

Respectfully submitted,

By: /s/ Dennis R. Kurz

Dennis R. Kurz

Texas State Bar # 24068183

Attorney in Charge for Plaintiff

WEISBERG & MEYERS, L.L.C.  
Two Allen Center  
1200 Smith Street  
16th Floor  
Houston, TX 77002  
(888) 595-9111 ext. 412  
(866) 565-1327 (fax)

**CERTIFICATE OF SERVICE**

I certify that on June 22, 2011, I electronically filed the foregoing document with the clerk of the U.S. District Court, Western District of Texas, El Paso Division, using the electronic case filing system of the court. Copies of the foregoing were sent to below via U.S. mail on this 22<sup>nd</sup> day of June, 2011.

First American Solutions, LLC  
CK Asset Holdings, LLC  
c/o Kenneth Jones  
3937 Sunset Blvd. Ste. E.  
West Columbia, SC 29169

Mark Stevens  
110 SCHOOL BUS RD  
WEST COLUMBIA, SC 29172-2456

/s/ Dennis R. Kurz  
Dennis R. Kurz